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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

COMPLAINT

v.

RODNEY FEQUIERE

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EASTERN DISTRICT OF NEW YORK, SS:

I, Brian Conolly, being first duly sworn, hereby depose and state as follows:

In or about and between November 2013 and the present, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant RODNEY FQUIERE, did knowingly and intentionally attempt to recruit, entice, harbor, transport, provide, obtain and maintain by any means, an individual who had not attained the age of 18 years, and would be caused to engage in one or more commercial sex acts.

(Title 18, United States Code, Sections 1591(d) and 3551 et seq.)

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I have been a Special Agent with the Federal Bureau of Investigation for approximately 9 years. I am responsible for conducting and assisting in investigations into the activities of individuals and criminal groups responsible for sex trafficking and child prostitution.

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

I have participated in numerous investigations of sex trafficking and child prostitution. I have also participated in physical surveillance, execution of search warrants, arrest warrants and debriefings of informants and victims. As a result of my training and experience, I am familiar with the techniques and methods of operation in which sex traffickers operate and the way in which minor girls are recruited or coerced, advertised, and caused to engage in commercial sex acts. One of the methods of recruitment of minors is through Facebook, where sex traffickers attract underage minors to work in the prostitution business. I am also familiar with the use of www.backpage.com and www.craigslist.com as a method by which sex traffickers advertise females for prostitution.

2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. Because the purpose of this affidavit is limited to demonstrating probable cause for the defendant's arrest, it does not set forth all of my knowledge about this matter. In addition, when I rely on statements made by others, such statements are set forth only in part and in substance unless otherwise indicated.

A. Background

3. As part of a sex trafficking investigation, a cooperating witness ("CW"), whose information has been corroborated by independent evidence, has been providing information to the FBI concerning potential minors involved in sex trafficking. The CW has pleaded guilty to sex trafficking and is cooperating with the government in the hope of receiving a reduced sentence.

4. In November 2013, I, along with the CW, created a Facebook page profile of a 15-year old female, "Lisa Roberts," (hereinafter "Roberts") who is purporting to engage in

prostitution. As part of the profile, several photographs of Roberts were posted on her Facebook profile, as well as references to her involvement in the prostitution business. For example, on November 13, 2013, Roberts posted on Facebook a status update that said: “getting this money up for daddy” and on November 15, 2013, Roberts posted “Stackin for daddy”.

5. On November 13, 2013, the CW, while assuming the created on-line identity of “Lisa Roberts,” was contacted via Facebook messenger by the defendant, RODNEY FEQUIERE. Through Facebook instant messaging, FEQUIERE stated in substance that he was “looking for a female to make money with like a female partner in crime cause i have a couple of business [sic] that i would like to expand and i would like to do that with you.” Roberts responded that it “depends what business you’re talking about” and advised FEQUIERE that she was a “very upscale escort.” FEQUIERE responded in substance that he has been in the escort industry for over 10 years and that he was currently working with a female. At this point, Roberts advised FEQUIERE, in substance, that she was a 15 year-old runaway who has a “pimp right now” but she was having problems with him. FEQUIERE responded: “Wow u 15 ; you a minor that is mad jail time for real a nigga can get locked up fucking wit you.” Roberts assured FEQUIERE that she “doesn’t look 15” and she is very mature for her age. FEQUIERE responded, “I could help you do anything else but I can get locked up helping you getting money illegally cause you a minor, but holla at me when you get a phone.”² Roberts responded, in substance, that her pimp doesn’t allow her to use the telephone freely. During this conversation, FEQUIERE also

² Upon identifying FEQUIERE via Facebook, the FBI conducted further investigation into his criminal activity, which included a 2008 A misdemeanor arrest for Promoting Prostitution. Moreover, the FBI identified a minor trafficking victim who FEQUIERE prostituted in 2012 when she was 17 years old. Further investigation included a review of FEQUIERE’s account on [www.backpage.com](http://www backpage.com), an adult entertainment website, which shows prostitution advertisements linked to FEQUIERE beginning in June 2012.

requested to see Roberts advertisement, "What part of long island cause I would like to see your ad" and requested that she call him once she gets a telephone, "Oh Ok holla at me when you can get to a phone".

6. From November 18, 2013 until January 4, 2014, "Lisa Roberts" communicated with FEQUIERE via Facebook concerning leaving her current pimp to work for FEQUIERE. For example, on November 18, 2013, FEQUIERE contacted Roberts at 5:44 pm via Facebook instant message and asked "When can I come thru to pick u up." On November 20, 2013, at 12:13 am, FEQUIERE asked "Where you at?".

7. On November 22, 2013 at 3:47 am, FEQUIERE asked "When are we going to meet up?." During this on-line conversation, Roberts again responded that she has not been able to leave her pimp and expressed concerns about leaving him, without an assurance that she will be taken care of by FEQUIERE. FEQUIERE responded that he is still willing to pick her up, "So do you have an idea what time and where are you at now?". In addition, FEQUIERE asked: "Wats your P's name is he your friend on fb? Where will I meet you?" Roberts responded that her pimp's name is "Malicious da don" and he is not on Facebook.

8. On December 4, 2013, an FBI agent acting in an undercover capacity called FEQUIERE posing as "Lisa Roberts." During this recorded conversation, FEQUIERE again wanted to know where Roberts was currently working and wanted to schedule picking her up. FEQUIERE stated, in substance, that he wanted to make sure that he was not part of a setup considering Roberts age, so he wanted to meet Roberts in person. FEQUIERE also informed Roberts that he has worked as a driver for an escort agency. After this telephone conversation, FEQUIERE communicated on December 6, 2013, via Facebook that he was ready to pick up

Roberts.

9. On December 20, 2013, an FBI agent acting in an undercover capacity called FEQUIERE again posing as "Lisa Roberts." During this recorded conversation, FEQUIERE again asked where Roberts was currently working and when he could pick her up. FEQUIERE also asked what name Roberts is using to post her on-line advertisements because he wanted to see them. Roberts responded that her pimp does not allow her to post her own advertisements so she does not know where her advertisements appear on-line.

10. On December 23, 2013, the CW, posing as Roberts' pimp named "Malicious", called FEQUIERE. During this recorded conversation, FEQUIERE admitted in substance to his involvement in the prostitution business, his knowledge that Roberts is a minor and agreed to take Roberts from the CW. FEQUIERE also mentioned that he initially thought Roberts was part of a sting, because of her age. FEQUIERE also stated, in substance, that he doesn't work in Queens anymore because it's "hot." Based on my training and experience, I know that "hot" refers to a presence of law enforcement in the area. FEQUIERE also spoke in substance about his current prostitute, whom he referred to as his "Snowbunny," who he stated he recruited from Pennsylvania. FEQUIERE also voiced his concern about law enforcement's initiative to arrest individuals for "the White Slavery charge". Rodney also stated that he didn't discuss being a pimp, "all that P stuff is out the window," with Roberts because it could be "recorded."

11. Soon after the telephone call, FEQUIERE communicated with Roberts via Facebook that her pimp had contacted him, "Wats good wit you your daddy called me" and that he had agreed to take her from her current pimp, stating, "I told your P I would take you of his hands

but I cant put u in any spots he had you in before so yall wont bump heads....”.

12. On January 6, 2014, FEQUIERE communicated with Roberts via Facebook, “Aight I am waiting on you i got a room for you in my house and I am ready to take you out of town to trap.” Based on my training and experience, I know that “to trap” means to engage in the prostitution business.

13. On March 11, 2014, Roberts reinitiated contact with FEQUIERE via Facebook, however there was no response from FEQUIERE.³ Later that same day, Francis Fequiere, who has been identified as the brother of FEQUIERE, contacted Roberts’ Facebook and stated: “Hi Rodney said to call him or text 6465009465 Facebook blocked him from sending messages.” Roberts responded that she does not have access to a telephone but requested FEQUIERE’s email address. Francis Fequiere provided the email of FEQUIERE as RodneyFequiere@aol.com.

14. On March 12, 2014, Roberts communicated with FEQUIERE via the email account RodneyFequiere@aol.com. Roberts indicated that she was frustrated with her current pimp. FEQUIERE responded, “I am waiting for you, just let me know you want me to pick you up.”

15. On March 18, 2014, Roberts communicated with FEQUIERE via email that she was in Brooklyn and ready to meet him. FEQUIERE responded, “Where are you at so I can pick u up ? 6465009465 call or text me.”

16. On March 18, 2014, Roberts and FEQUIERE further communicated and

³ On February 11, 2014, a search warrant was conducted on FEQUIERE’s Facebook account.

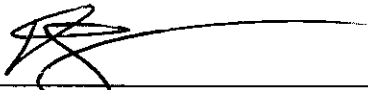
FEQUIERE arrived at Sunny 39 hotel in Brooklyn, New York at approximately 8:45 p.m. in a white 2003 Ford Expedition.⁴ Also, inside the vehicle was FEQUIERE's approximately one-year old child and a female who the FBI has identified as a prostitute of FEQUIERE's who had been arrested with FEQUIERE in the aforementioned 2008 Promoting Prostitution arrest.

17. During a post-arrest Miranda interview, the defendant admitted in sum and substance that he had prostituted a minor in 2012 who was seventeen years old.

⁴ This vehicle resembles a car which was depicted in FEQUIERE's www.backpage.com account advertisements.

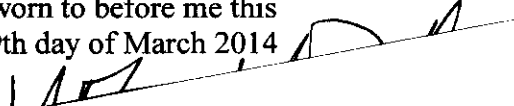
WHEREFORE, your deponent respectfully requests that the defendant RODNEY FEQUIERE be dealt with according to law.

Dated: Brooklyn, New York
March 19, 2014



Brian Conolly
Special Agent
FBI

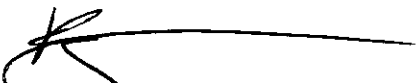
Sworn to before me this
19th day of March 2014



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BRIAN CONOLLY
Special Agent
Federal Bureau of Investigations